

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA

GRADY O. HUMPHREYS, et al.,

Plaintiffs,

vs.

CIVIL ACTION NO.
2:07-CV-607-WKW

ASBESTOS DEFENDANTS:
A. O. SMITH ELECTRICAL PRODUCTS
COMPANY, a division of A.O. SMITH
CORPORATION, et al.,

Defendants.

**JOINDER OF DEFENDANTS UNION CARBIDE CORPORATION, FOSECO, INC.
AND BAYER CROPSCIENCE, INC. F/K/A AVENTIS CROPSCIENCE USA, INC.
(F/K/A RHONE POULENC AG COMPANY, INC. F/K/A RHONE POULENC, INC.,
F/K/A UNION CARBIDE AGRICULTURAL PRODUCTS, INC. F/K/A AMCHEM
PRODUCTS, INC., A SUCCESSOR TO BENJAMIN FOSTER COMPANY IN MOTION
TO DISMISS, OR IN THE ALTERNATIVE, MOTION TO SEVER AND FOR MORE
DEFINITE STATEMENT, AND MEMORANDUM IN SUPPORT THEREOF**

COME NOW Defendants Union Carbide Corporation, Foseco, Inc. And Bayer
Cropscience, Inc. F/K/A Aventis Cropscience USA, Inc. (F/K/A Rhone Poulenc Ag Company,
Inc. F/K/A Rhone Poulenc, Inc., F/K/A Union Carbide Agricultural Products, Inc. F/K/A
Amchem Products, Inc., A Successor To Benjamin Foster Company, sued incorrectly in
Plaintiffs' Complaint as Bayer CropScience, Inc., individual and as successor to Aventis
CropScience USA, Inc. f/k/a Rhone-Poulenc Ag Co. f/k/a Amchem Products, Inc., Benjamin
Foster Co., (hereinafter "Defendants"), and hereby joins in Motion To Dismiss, Or In The
Alternative, Motion To Sever And For More Definite Statement, And Memorandum In Support
Thereof, which Motion was filed by Defendant Bondex International, Inc. on August 13, 2007
and adopts it as if fully restated herein.

WHEREFORE, Defendants move the Court to grant the Motion To Dismiss, Or In The Alternative, Motion To Sever And For More Definite Statement, And Memorandum In Support Thereof filed by Bondex International, Inc. and provide any other relief the Court deems justified.

This 28th day of August, 2007.

Respectfully submitted.

HAWKINS & PARNELL, LLP

/s/ Evelyn M. Fletcher

Evelyn M. Fletcher

SJIS FLE019

AL Bar No. ASB-1485-C19E

Elizabeth B. Padgett

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Attorneys for Defendants Union Carbide Corporation, Foseco, Inc. and Bayer CropScience, Inc. f/k/a Aventis CropScience USA, Inc. (f/k/a Rhone Poulenc AG Company, Inc. f/k/a Rhone Poulenc, Inc., f/k/a Union Carbide Agricultural Products, Inc. f/k/a Amchem Products, Inc., a successor to Benjamin Foster Company)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this date served the foregoing Joinder Of Defendants Union Carbide Corporation, Foseco, Inc. And Bayer Cropscience, Inc. F/K/A Aventis Cropscience USA, Inc. (F/K/A Rhone Poulenc Ag Company, Inc. F/K/A Rhone Poulenc, Inc., F/K/A Union Carbide Agricultural Products, Inc. F/K/A Amchem Products, Inc., A Successor To Benjamin Foster Company In Motion To Dismiss, Or In The Alternative, Motion To Sever And For More Definite Statement, And Memorandum In Support Thereof upon all counsel by the CM/ECF system. I also certify that a copy of the foregoing has been furnished to Plaintiffs'

counsel, G. Patterson Keahey, Jr., Esq. by mailing same with postage prepaid to Law Offices of G. Patterson Keahey, P.C., One Independence Plaza, Suite 612, Birmingham, AL 35209.

This 28th day of August, 2007.

HAWKINS & PARNELL, LLP

/s/ Elizabeth B. Padgett

Evelyn M. Fletcher

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